



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 15, 2020

Hon. Lewis J. Liman
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Isaam Henry, 20 Cr. 293 (LJL)

Judge Liman:

The Government respectfully requests that the Court authorize Linda Thomas, the Southern District of New York Jury Administrator, to speak with the Government, including Janis Echenberg, Deputy Chief of the Criminal Division, regarding the empanelment of the grand jury currently sitting in White Plains (the “Grand Jury”), which returned the Indictment in the above-captioned case.

On June 12, 2020, the defendant, Isaam Henry, filed a motion (the “Motion”) seeking more than 20 categories of documents and records related to the Grand Jury. (Dkt. 23.) The Government seeks Ms. Thomas’s assistance to (i) establish whether the enumerated documents and records exist; (ii) provide a description of the type of information contained in the requested documents and records; and (iii) to advise the Government regarding how such records are maintained, in order to formulate the Government’s response to the Motion, as well as similar motions filed in other recently indicted cases (*e.g.*, *United States v. Baker, et al.*, 20 Cr. 288 (LJL); *United States v. Balde*, 20 Cr. 281 (KPF)).

The Government further respectfully requests a one-week extension of the current deadline of June 17, 2020 to respond to the Motion. The extension will allow time for consultation with Ms. Thomas and discussion with defense counsel regarding possible areas of agreement about documents and records to be provided to the defendant, subject to the permission of the Court, who the Government understands maintains such records.

Respectfully,

GEOFFREY S. BERMAN
United States Attorney

by: _____/s/ Thomas Burnett _____
Thomas S. Burnett
Assistant United States Attorney
(212) 637-1064